

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IBEW LOCAL NO. 56 VACATION
FUND, NATIONAL LABOR MANAGE-
MENT COOPERATIVE COUNCIL, NA-
TIONAL ELECTRICAL BENEFIT FUND,
MICHAEL ALBERICO AND AL CHURCH,
AS TRUSTEES OF THE IBEW LOCAL
UNION NO. 56 PENSION FUND, IBEW
LOCAL UNION NO. 56 HEALTH AND
WELFARE FUND, IBEW LOCAL UNION
NO. 56 EMPLOYEES DEFERRED SAV-
INGS PLAN, IBEW LOCAL UNION NO. 56
DELINQUENCY PENALTY DEFAULT
FUND, ELECTRICAL EDUCATIONAL
TRUST FUND and IBEW LOCAL UNION
NO. 56 SUPPLEMENTAL UNEMPLOY-
MENT FUND,**

Plaintiffs,

vs.

CRAIGER, ELECTRIC, INC.,

Defendant.

CIVIL ACTION NO.: 05-61E

*This document was electronically
filed.*

JOINT DISCOVERY PLAN

1. Counsel for Plaintiffs and Counterclaim Defendants, IBEW Local No. 56 Vacation Fund, et. al., (hereinafter Plaintiffs) and Counsel for Defendant, Counterclaim Plaintiff, Craiger Electric, (hereinafter Defendant) hereby file this Joint Proposed Discovery Plan pursuant to the Court's preliminary scheduling order.

2. Initial Disclosures.

The parties will exchange by August 12, 2005, (14 days after the status conference with the Court) the information required by Fed.R.Civ.P. 26(a)(1).

3. Amendment of Pleadings.

The last day to amend pleadings or join additional parties is September 30, 2005.

4. Discovery Plan.

The parties propose the following discovery plan:

A. The Discovery Period. Discovery should commence on August 15, 2005, and end 90 days later on November 14, 2005. All written discovery shall be served sufficiently in advance of November 15, 2005, to permit responses to be completed by that date. The parties anticipate that discovery will include depositions, requests for production and requests for admissions.

B. Experts. The parties propose that reports from any experts under rules 26(a)(2) be due on October 3, 2005, and that expert reports for rebuttal purposes shall be due on October 24, 2005.

C. Modification of Discovery Rules. The parties propose that discovery shall be in accordance with the Federal Rules of Civil Procedure.

5. Suggested Date for Filing of Dispositive Motions:

December 19, 2005.

6. Suggested Date for Plaintiffs and Counterclaim Plaintiff's Pretrial Statements:

February 1, 2006.

7. Suggested Date for Defendant's and Counterclaim Defendants' Pretrial Statements:

February 22, 2006.

8. Suggested Date for Pretrial Conference:

March 22, 2006.

9. Suggested Trial Date:

June 2006.

Respectfully submitted,

MEYER, UNKOVIC & SCOTT LLP

BY: s/ Joseph A. Vater, Jr.
JOSEPH A. VATER, JR.
Pa. I.D. #23654

1300 Oliver Building
Pittsburgh, PA 15222
(412)456-2827

Counsel for Plaintiffs/
Counterclaim Defendants

ELDERKIN, MARTIN, KELLY & MESSINA

BY: s/ Christopher J. Kovski
Christopher J. Kovski

Jones School Square
150 East Eighth Street
Erie, PA 16501-1269

Counsel for Defendant/
Counterclaim Plaintiff